

U.S. Coast Guard (Brendan Harris)

The Coast Guard continues to appreciate the cooperative relationship that it shares with the State of Washington Department of Ecology and the Board of Pilotage Commissioners. Through these productive relationships, we have worked together to protect the Puget Sound, its adjoining waterways, and its marine life from various threats, including oil pollution. Puget Sound is a crucial waterway to the citizens of Washington State, our sovereign tribal communities and to the Nation. The Coast Guard supports the State of Washington's forward-leaning stance regarding environmental safety and protection, including its desire to mitigate oil spill risks in Puget Sound. Through our respective authorities, we have protected the pristine nature of Puget Sound and established effective rules to mitigate oil spill risks in the Puget Sound and its adjoining waters throughout the State.

These comments are related to the findings in the Summary of Tug Escort Analysis Results that were released to the Coast Guard and the Public in September 2023. The primary concern is that the study model shows, under simulated circumstances, the overall reduction in oil spill incidents is negligible while significantly increasing vessel traffic. The increase in vessel traffic will result in increased vessel interactions and potentially cause a higher rate of marine casualties in the Puget Sound and adjacent waters. Due consideration should be given to the national and international existing tug escort requirements within the proposed area to ensure duplicative efforts are not being made for regulatory requirements.

Thank you for the opportunity to comment on this rulemaking. The Coast Guard looks forward to our continued relationship in jointly working to protect all the waters of the Puget Sound, the marine life, and the navigability for the various of vessels that work and recreate within these waters.

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Northwest District

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July 15, 2025

State of Washington Dept of Ecology
300 Desmond Dr. SE
Lacey, WA 98503

Board of Pilotage Commissioners
2901 Third Avenue, Suite 500
Seattle, WA 98121

Dear State of Washington Department of Ecology and Board of Pilotage Commissioners:

The U.S. Coast Guard greatly appreciates the cooperative relationship it shares with the State of Washington Department of Ecology and Board of Pilotage Commissioners. Through these productive relationships, we have worked together to protect Puget Sound and its marine life from various threats, to include oil pollution. Puget Sound is a critical body of water to both the citizens of Washington and the people who use it for navigation purposes. The U.S. Coast Guard supports the State of Washington's forward-leaning stance regarding environmental safety and protection, to include its desire to mitigate oil spill risks in Puget Sound. Through our respective regulatory authorities, we have protected the pristine nature of Puget Sound and established effective rules to mitigate oil spill risks in its waters.

This letter is to inform and hopefully open a productive dialogue to discuss RCW 88.16.190 and 88.16.260 and the findings in the Summary of Tug Escort Analysis Results released to the Coast Guard and the public in September 2023 [hereinafter, "Summary"]. The U.S. Coast Guard appreciates the work and research done to create the 196-page report and would like to discuss those findings. The primary concern is that the study model shows, under simulated circumstances, the overall reduction in oil spill incidents is negligible while significantly increasing vessel traffic in Puget Sound and adjacent waters.

The Coast Guard has regulatory authority over the navigable waterways of Puget Sound and adjacent waters under 33 CFR § 165.1303, to include the power to regulate tug escort requirements for tank vessels. We respect the State of Washington's desire to protect waterways from oil spills, but the Coast Guard does not find the Summary supports expanding current tug escort requirements in Puget Sound. Instead, it suggests more collisions and spills could result due to increased vessel traffic and risks to safety of navigation in congested waterways. If the State intends to proceed with expanding current tug escort requirements as proposed, the Coast Guard is prepared to submit public comments documenting our concerns while emphasizing our support to preserving the pristine Pacific Northwest waters.

The Coast Guard values its relationship with the State of Washington in executing our shared goals to protect Washington's waters from environmental damage. We look forward to continued cooperation on this matter. Should you have questions or wish to discuss this further, please feel free to me at (206) 747-8104 or Darwin.A.Jensen@uscg.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "D. A. Jensen".

D. A. JENSEN

Captain, U.S. Coast Guard
Chief of Prevention, Coast Guard Northwest District